

Jason S. Brookner (Texas Bar No. 24033684)
Andrew K. York (Texas Bar No. 24051554)
Joshua D. Smeltzer (Texas Bar No. 24113859)
Drake M. Rayshell (Texas Bar No. 24118507)

GRAY REED

1601 Elm Street, Suite 4600
Dallas, TX 75201
Telephone: (214) 954-4135
Facsimile: (214) 953-1332
Email: jbrookner@grayreed.com
dyork@grayreed.com
jsmeltzer@grayreed.com
drayshell@grayreed.com

Counsel to Patrick Daugherty

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:	§	
	§	Chapter 11
HIGHLAND CAPITAL MANAGEMENT, L.P., ¹	§	Case No. 19-34054 (SGJ)
Reorganized Debtor.	§	
	§	
	§	

**DECLARATION OF PATRICK H. DAUGHERTY IN SUPPORT OF RESPONSE TO
MOTION TO QUASH SUBPOENAS SERVED BY PATRICK DAUGHERTY**

I, Patrick H. Daugherty, pursuant to 28 U.S.C. § 1746, under penalty of perjury, declare as follows:

1. I submit this declaration (the “Declaration”) in support of the Response to Motion to Quash Subpoenas Served by Patrick Daugherty, being filed simultaneously with this Declaration. This Declaration is based on my personal knowledge and review of the documents listed below.

¹ Highland’s last four digits of its taxpayer identification number are (8357). The headquarters and service address for Highland is 100 Crescent Court, Suite 1850, Dallas, TX 75201.

2. On or about June 10, 2025, I texted Mark Patrick, that I was “open to discussing other options” relating to the proposed settlement between Highland and the HMIT Entities due to the Objection I filed to the proposed settlement. Mr. Patrick responded that I should feel free to reach out to Louis Phillips, counsel for the HMIT Entities. I replied that I “only speak principal to principal.” Mr. Patrick never communicated further regarding my overture.

Dated: June 22, 2025

/s/ Patrick H. Daugherty

Patrick H. Daugherty